

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE

JOSE A TIRADO VAZQUEZ

DEBTOR(S)

CASE NO. 17-03750-ESL

CHAPTER: 13

SUR-REPLY TO DEBTORS REPLY TO MOTION REQUESTING DISMISSAL

TO THE HONORABLE COURT:

Comes now, **RELIABLE FINANCIAL SERVICES, INC.**, Movant herein, through the undersigned attorney and very respectfully Alleges and Prays:

1. On **January 30, 2018** Movant filed a motion requesting dismissal of the case due to the fact that debtor failed to renew their annual insurance policy for the motor vehicle.

2. On **February 12, 2018** Debtor's filed a reply stating that they renewed the insurance policy required by the Movant and presented a certificate of insurance. However, debtor failed to provide a certificate of payment regarding said insurance policy.

3. As of today's date, Movant has not received the evidence necessary to deem that the insurance was effectively renewed.

WHEREFORE, Movant respectfully prays this Court to enter an order compelling debtor to provide a certificate of payment for the insurance policy that was submitted by debtor with their reply to Movant's motion requesting dismissal.

CERTIFICATE OF SERVICE

I hereby certify that the present motion was filed electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the **JOSE R. CARRION**, Trustee and **ROBERTO FIGUEROA CARRASQUILLO**, Debtor(s) Attorney and that we have sent copy of this document through regular mail to Debtor(s) **JOSE A TIRADO VAZQUEZ, URB ALTOS DE LA FUENTE C7 1ST ST CAGUAS, PR 00727** and to all non CM/ECF participants interested as per mailing list which is hereby included.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico this 21st day of FEBRUARY, 2018.

/S/ CARLOS E. PEREZ PASTRANA
USDC-208913
Attorney for Movant
PO BOX 21382
SAN JUAN, PR 00928-1382
TEL. 787-625-6645 FAX: 787-625-4891
cperezp@reliablefinancial.com